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OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

December 21, 1992

William Buller
RCRA Enforcement Branch (5HR-12)
Waste Management Division
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

RE: Administrative Order on Consent IND 044 587 848
Franklin Power Products, Inc. and Amphenol Corporation
REQUEST FOR EXTENSION OF TIME TO SUBMIT DRAFT RFI REPORT

Dear Mr. Buller:

Article VII 2(b) of the referenced Consent Order requires that a draft RFI report be submitted to you within 75 days of the approval of the supplemental plan. Our records indicate the supplemental plan was approved on October 19, 1992, making the draft RFI report due on January 2, 1993.

The 75 day deadline is reasonable and appropriate in a case where only additional sampling and analysis of existing wells is necessary prior to completing the draft RFI. Seventy-five days is not sufficient time in a situation where a greater scope of work is required. On October 26, 1992, our consultant, James Keith of W. W. Engineering and Science, Inc., acknowledged in writing Region V's approval of a supplemental Work Plan and, based on the scope of work of the Plan, included a preliminary schedule indicating that the Draft RFI report would be submitted by March 2, 1993. That letter was for informational purposes only, and was not a formal request for extension of time. Shortly after the approval of the supplemental Work Plan, the Respondents, through W. W. Engineering and Science, performed additional on-site sampling and initial off-site sampling. Based upon those results, a revised Work Plan was submitted with modified off-site sampling procedures. You have had a number of discussions with Mr. Keith regarding the sampling methodology and operating procedures to be employed; based on your comments, a modified Work Plan has been submitted and is awaiting your further comment or approval.

Please accept this as a formal request on behalf of the Respondents for an extension of time until no later than April 1, 1993 in which to submit a draft RFI report. We believe that we have proceeded with all due diligence, and that we could not reasonably foresee at the time the Consent Order was signed that

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75 days would be inadequate to complete any required supplemental work and submit a draft RFI. This request is not made for the purpose of delay but rather to allow Respondents to fully comply with the spirit and intent of the Consent Order.

Article XIX provides that such an extension shall be accomplished through written amendment to the Consent Order. Would you please forward a copy of a proposed amendment, or have someone in your legal department contact me, so that we may make sure we remain in compliance. My office is located at 1000 Waterway Boulevard, Indianapolis, IN 46202; my direct phone number is 317/633-2069; my fax is 317/634-1791. Your prompt attention to this matter is greatly appreciated.

Very truly yours,

FRANKLIN POWER PRODUCTS, INC.

BY: Susan W. Gard
Susan W. Gard
Corporate Counsel

Via certified mail - P676 651 822
Via fax 312/353-4788

cc: James Keith - WW Engineering & Science
Mike Jarvis - Franklin Power Products, Inc.
Sam Waldo - Amphenol Corporation